

IN THE UNITED STATES DISTRICT  
COURT WESTERN DIVISION FOR THE  
NORTHERN DISTRICT OF OHIO

Renz, et. al,  
Plaintiff  
Attorneys:  
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&

Robert Gargasz (Bar ID 7136)  
1670 Cooper Foster Park Rd.  
Lorain, OH 44053

-VS-

State of Ohio, et. al

Defendant(s)

CASE NO. 3:20-cv-1948

JUDGE: Honorable Judge  
James Carr

EXHIBIT – Attachment E:  
FOIA Request  
Documentation

The following has been submitted by Plaintiff's attorney, Thomas Renz.

Respectfully submitted,

s/ Thomas Renz

ATTORNEY  
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	Date Requested	To Whom	Description	Date received?	
#1	26-Apr		Acton's resume, letter of interest, & letter of qualification for her current position as director of ODH.		
#2	26-Apr	ODH	Emails to or from Acton re: covid 3/9 - 3/15/20	no	
#3	26-Apr	ODH	Emails re: masks to or from Acton or Dewine 4/1-4/26	no	
#4	28-Apr	ODH	Emails to or from Acton re: school activities & closures from 1/1/-4/28	no	
#5	Apr-20	ODH	Data from 4/15-4/23 data used to determine & compile the daily reports & data (total tested, number of positive cases, deaths, hospitalizations, ICU, healthcare workers) provided on the ODH website as well as by Acton & DeWine at daily press conferences	no	
#6	2-May	ODH	Documents (such as death certificates) used to determine all covid-19 deaths that are indicated by ODH on their website.	denied on 8/21	Note: waiting 3.5 months for their reply gave me no opportunity to ask questions & revise my request. I continued to request additional records for several months.
#7	11-May	ODH	Resume, job description & records of education (college, continuing education, professional credits, certification) for the State of Ohio's epidemiologist Sietske de Fijter.	yes 5/19	Note: why have none of us ever heard of the ODH state epidemiologist? Why has she never been mentioned or appeared at a press conference?
#8	13-May	ODH	Copies of all emails sent to or from Amy Acton from 3/1/20 to 5/13 regarding lab testing & results of samples for coronavirus/covid-19 that had previously resulted in a negative or positive result for the flu.	no	
#9	13-May	ODH	Documentation from 3/1- 5/13 re: All emails & sent to or from Amy Acton, and other documentation in the possession of ODH, re: Antibody tests/testing that resulted in cases being added to the ODH's daily verbal & online public reports of cases, deaths and/or hospitalization for coronavirus/covid-1.	no	
#10	19-May	ODH	Request for copies of the job description & records of education (college/university, continuing education, professional credits, certification) for Amy Acton. These records would typically be kept in employment/personnel/human resources files.	yes 6/13	Only CV. Although Acton & DeWine claimed 30 years of public health experience, CV shows very little experience in public health or working fulltime. No evidence of education or certifications claimed on her CV.
#11	26-Jun	ODH	Copies of the following information indicated on the copy of Amy Acton's curriculum vitae that recently provided:	yes 8/20	No responsive records except item #17. So no verification of anything claimed by Acton prior to hiring.
			1) ODH's verification of Acton's employment, position & employment dates for The Columbus Foundation, Community research and grants management officer (2017-2018)	no records responsive.	

			2) ODH's verification of Acton's employment, position & employment dates for OSU College of Public Health, Adjunct professor (2011-2017)	no records responsive.	
			3) ODH's verification of Acton's employment, position, & employment dates for Center for Injury Research & Policy, the Research Institute at Nationwide Children's Hospital, Visiting faculty professor (2011-2013)	no records responsive.	
			4) ODH's verification of Acton's employment, position & employment dates for OSU College of Public Health, Adjunct professor (1997-2003)	no records responsive.	
			5) ODH's verification of Acton's employment, position & employment dates, Love our kids, vaccinate early, Director (1998-2000)	no records responsive.	
			6) ODH's verification of Acton's consultancy/position, employment & employment dates, Bexley City Schools. Consultant, preventive medicine (2003-2012)	no records responsive.	
			7) ODH's verification of Acton's consultancy & dates, 1996 Healthy Summit 2000, Akron City Health Dept. Consultant	no records responsive.	
			8) ODH's verification of Acton's employment, position & employment dates, ODH Division of family & community health (1995-1996)	no records responsive.	
			9) ODH's verification of Acton's residency in preventive medicine, OSU (1996)	no records responsive.	
			10) ODH's verification of Acton's Internship/residency training pediatrics, Albert Einstein College of Medicine NYC (1996)	no records responsive.	
			11) ODH's verification of Acton's Internship/residency training pediatrics, Children's Hospital/OSU Columbus (1996)	no records responsive.	
			12) Copy of diploma or transcript for Acton's masters in public health, OSU (1996)	no records responsive.	
			13) Copy of diploma or transcript for	no records responsive.	
			1990 medical school: Northeastern Ohio University College of Medicine, accelerated 6-year program (1990)	no records responsive.	
			14) Copies of Acton's personal references & verification of such.	no records responsive.	

			15) Verification of volunteer experience indicated on Acton's CV, including but not limited to Volunteer @ Children's International Summer Villages (2006-2012)	no records responsive.	
			16) Verification of the "over 30 years of experience in teaching & data analysis, academic & nonprofit administration, government & community service, medical practice, consulting, and healthcare policy & advocacy" as indicated on Acton's CV.	no records responsive.	
			17) Copy of the Director of ODH job description dated 2019 (the predecessor to the May 2020 version you provided in response to my last request).	Yes but was from 2017.	
#12	1-Jul	ODH	Rquest for copies of the death certificates that ODH used to determine all covid-19 deaths that are indicated by ODH on their covid-19 website from 5/3/20 to the present. Follow-up for 5/2/20 public records request for the same records up to that point as well as for the other 9 pending requests I've sent over the past 2 months but have not received a reply to.	Denied - 8/21	
#13	13-Jul		Request for copies of the death certificates that ODH used to determine all covid-19 deaths that are indicated & reported by ODH on their covid-19 website, at press conferences to the public, & to the media, from 7/1/20 to to 7/13. Follow-up to 5/2/20 & 7/1/20 public records requests for the same records up to that point, & 9 other pending requests over past 3 months.	Denied - 8/21	
#14	21-Aug	ODH	#14 ODH Public Records Request - Procedures involved to obtain covid counts each day for reporting on the ODH website, procedures involved in reconciling determination of death as reported to ODRS with the individual's death certificate, & procedures for updating covid-19 data death data on ODH public website after reconciliation	Pending	
#A	Mar-20	Governor	Request for Acton's resume via online system. No answer to phone calls. No way to leave a message. No Response	No response.	
#B	Apr-20	Governor	Request for emails from 3/9-3/15 mentioning covid keywords	No response.	
#1	30-Apr	Governor	Followup request for Acton's resume, letter of interest, qualifications	7/28 received response to items 1-4.	Appears to be incomplete. Very few records.

#2	30-Apr	Governor	Request for emails mentioning words such as mask, face covering etc.	7/28 received response to items 1-4, appears to be incomplete. Very few records.	Appears to be incomplete. Very few records.
#3	30-Apr	Governor	Request for emails from 3/1-4/30 re: businesses requiring face masks	7/28 received response to items 1-4	Appears to be incomplete. Very few records.
#4	30-Apr	Governor	Request for DeWine emails from 1/2-4/30 regarding school & activity restrictions due to covid-19	7/28 received response to items 1-4.	Appears to be incomplete. Very few records.
	28-Jul	Governor	Emails from #1-#4 received but had redacted email addresses, including DeWine's. He uses a personal email address on a regular basis. Requested them unredacted, cited 2014 OAG DeWine opinion	No response.	